

Exhibit 8

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VIA E-MAIL ONLY

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Re: *Hill, et al. v. Town of Valley Brook, et al.*,
Case No. 21-97, United States District Court for the Western District of
Oklahoma
Paper Document Production

Dear Counsel:

Pursuant to the Court's Order, we are producing documents maintained in paper format by Defendants in this matter. The production includes the following documents:

- (1) Invoices from Oklahoma County Jail. All documents in possession of Defendants are produced along with this correspondence. There were no invoices for the months of April 2020 – June 2020, April 2022 – June 2022, and September 2022.
- (2) Invoices from Pottawatomie County Jail. All documents in possession of Defendants are produced along with this correspondence.
- (3) Contract with Oklahoma County Jail/Jail Trust Authority. All documents in possession of Defendants are either produced along with this correspondence or were previously produced. Defendants do not have a copy of the contract for the 2018/2019 fiscal year. A copy has been requested from Oklahoma County and will be transmitted to you upon receipt.
- (4) Contract with Pottawatomie County Jail. All documents in possession of Defendants are produced along with this correspondence.

(5) Bond Schedule. All documents in possession of Defendants are produced along with this correspondence.

The Order also compelled production of any contracts/agreements concerning Judge Haynes' employment, the Town's financial statements, Town's audit reports, the Town's proposed budgets, and police training documents. With regard to these documents:

Contracts/Agreements with Judge Haynes. A review of Town Council Minutes and Agendas for the time period in question did not contain any reference to Judge Haynes' reappointment or pay structure. Defendants reviewed additional documents and were not able to locate a document setting forth a contract or payment structure with Judge Haynes.

Town's audit reports & budgets. All documents in possession of Defendants are or were previously produced. The last audit was occurred in 2019.

Budgets. All documents in possession of Defendants are produced along with this correspondence. In some instances, the budget was not located but included was the resolution passed by the Town Council approving the budget. These years include: FY 2017/18, 2019/20, 2022/23.

Training Documents. No responsive documents were located.

While not part of the Court's Order, Defendants' production also includes Daily Sheets with receipts for 2017 and 2018.

With regard to supplementing the Town's Response to Interrogatory 11, the Town supplements its response as follows:

RESPONSE TO INTERROGATORY NO. 11: Defendant Town provides transcription services as required by Oklahoma state law and in accordance with their status as a court not of record. Municipal Defendants are permitted to provide their own court reporter for proceedings. The Town has learned that Judge Haynes routinely records Rule 8 hearings on his telephone.

At this time, there is no supplementation of Defendant Nieman's response to Interrogatory No. 17.

Should you have any additional questions, please contact me.

Sincerely,
s/Courtney D. Powell